

ATTACHMENT 2

October 17, 2002

The Honorable Jeffrey W. Runge, M.D.
Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S.W.
Washington, D.C. 20590

RE: National Automotive Sampling System: Increased Funding

Dear Dr. Runge:

Sound crash and injury data are critical components needed for advanced vehicle safety design and for both initiating and evaluating countermeasures for improving highway safety. The National Highway Traffic Safety Administration's (NHTSA) Fatality Analysis Reporting System provides comprehensive data on people dying in motor vehicle crashes throughout the United States. These data have enjoyed widespread use in the evaluation of many motor vehicle safety countermeasures and their effectiveness in reducing motor vehicle death. NHTSA's National Automotive Sampling System Crashworthiness Data System (NASS/CDS) is an essential resource that provides the agency, researchers, vehicle manufacturers -- indeed the entire safety community -- with a detailed crash and injury causation database suitable for identifying traffic safety issues, establishing priorities, assisting in the design of future countermeasures and for evaluating existing countermeasures.

The NASS/CDS provides in-depth crash investigations of a representative sample of police-reported tow-away crashes throughout the United States, so data can be weighted to provide a nationwide estimate of crashes of all severities according to the severity of injuries. Furthermore, researchers can examine the detailed crash investigations in depth to learn about crash characteristics and injury causation focusing on subsets of the data. For example, such investigations have proven to be of critical importance in the understanding of airbag performance -- the conditions under which airbags save lives, but also when they contribute to occupant injury.

The application of sound science to improve traffic safety requires that real world data or field data be used wherever possible. The continuation of vehicle and highway safety improvements requires a solid factual basis. However, the essence of such investigations is timeliness. As the recent experience with frontal airbags has taught us, we need to understand as soon as possible how new vehicle technologies, such as airbags, are performing in the real world. And with new technologies being introduced at such a fast pace, it is now more important than ever to understand how these technologies are performing in the real world.

The agency's NASS/CDS database is one of the most comprehensive databases in the world to look in depth at the causes of motor vehicle injury. However, we are concerned that the budget for NASS has not kept pace with either the agency's informational needs or inflation. The NASS program has been constrained by either flat or reduced funding at a time when technological developments (e.g., advanced frontal and side air bags, telematics) and occupant behavior (from increased seat belt use to booster seat

installations) are changing. We believe it is important to ensure that NHTSA continues to have the ability to evaluate actual field performance on a national basis.

Therefore, NASS must have the resources necessary to collect high-quality, real-world data by conducting investigations at the full complement of sites that will provide statistically valid, nationally representative data on a timely basis. The NASS reorganization of the mid 1980's called for 36 Primary Sampling Units. Currently, NASS has the resources to conduct investigations at only 24 sites. The effectiveness of NASS has also been subject to inflationary increases in operating costs of about 3-5 percent per year, which have been offset by reducing field staff. This has resulted in fewer cases reported from the 24 sites.

From the original projections of 7000 cases annually, NASS has been reduced to providing only about 4500 cases annually across the spectrum of crash types and severities. The result is that there are often too few cases of serious injury to make an informed decision about the sources and mechanisms of injury in motor vehicle crashes (for example, in side impacts, or in crashes involving children) without having to include data from many years of data collection. This blunts our ability to look at current issues in real time. We believe NASS should be funded at a level that will restore NASS to its design scope to ensure critical "real-world" data can be collected at a sufficient number of sites to produce the statistically valid, nationally representative sample originally intended. Initially, the NASS design called for 50 active sites.

Thus, we believe it is critical that the proposed NHTSA fiscal year 2004 budget include a request to fully fund NASS, so that our ability to evaluate the effectiveness of both behavioral and vehicular safety measures is enhanced. We stand ready to support you in this most important endeavor.

Sincerely,

Josephine S. Cooper
President and CEO
Alliance of Automobile Manufacturers, Inc.

Phil Haseltine
President
Automotive Coalition for Traffic Safety

Timothy C. MacCarthy
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Association of International Automobile
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